

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:)	
)	Case No.: 23-60507 (PGR)
The Roman Catholic Diocese of Ogdensburg, New York)	
)	Chapter 11
)	
Debtor.)	
)	

**COVER SHEET TO FIRST INTERIM APPLICATION OF
BERKELEY RESEARCH GROUP, LLC FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 11, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Berkeley Research Group, LLC (“ <u>BRG</u> ”)
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors (the “ <u>Committee</u> ” or “ <u>UCC</u> ”)
Date of Retention:	Effective as of June 13, 2023 by order signed on July 12, 2023 [Docket No. 328]
Period for which Compensation and Reimbursement is Sought:	September 11, 2023 through November 30, 2023 ¹
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$32,964.28 ²
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$0.00

This is a(n): Monthly x Interim Final Application.

¹ The applicant reserves the right to include any time expended and expenses incurred in the period indicated above in future application(s) if it is not included herein.

² Pursuant to the Retention Application (defined below), BRG’s fees are based on fees for actual hours expended, charged at BRG’s standard hourly rates which are in effect when the services are rendered, less a voluntary 17% rate concession. Accordingly, we have reduced our fees for the Fee Period by \$6,751.72 as indicated on Attachment B and Attachment C.

Attachment A

Attachment A: Prior Fee Statements and Applications Filed

Date Filed Docket No.	Period Covered	Requested Fees	Requested Expenses	Order/ CNO	Approved Fees	Approved Expenses
N/A						

Attachment B



Attachment B: Fees By Professional

Berkeley Research Group, LLC

For the Period 9/11/2023 through 11/30/2023

Professional	Title	Billing Rate	Hours	Fees
P. Shields	Managing Director	\$815.00	2.2	\$1,793.00
R. Strong	Managing Director	\$780.00	3.5	\$2,730.00
M. Babcock	Director	\$725.00	30.5	\$22,112.50
C. Tergevorkian	Managing Consultant	\$450.00	23.5	\$10,575.00
S. Chaffos	Consultant	\$385.00	2.3	\$885.50
D. Godfrey	Case Assistant	\$150.00	1.2	\$180.00
S. Rawlings	Case Assistant	\$225.00	6.4	\$1,440.00
Total			69.6	\$39,716.00
Rate Concession		17%		(\$6,751.72)
Total Requested Fees				\$32,964.28
Blended Rate				\$473.62

Attachment C



Attachment C: Fees By Task Code

Berkeley Research Group, LLC

For the Period 9/11/2023 through 11/30/2023

Task Code	Hours	Fees
200.90 Document / Data Analysis (Production Requests)	31.2	\$17,183.00
220.00 Debtors Operations / Monitoring (Monthly Operating Reports / Periodic Reporting)	6.2	\$1,777.50
300.00 Asset Analysis (General - Debtors)	22.6	\$14,463.00
1010.00 Employment Application	5.5	\$4,031.00
1020.00 Meeting Preparation & Attendance	2.9	\$2,081.50
1060.00 Fee Application Preparation & Hearing	1.2	\$180.00
Total	69.6	\$39,716.00
Rate Concession	17%	(\$6,751.72)
Total Requested Fees		\$32,964.28
Blended Rate		\$473.62

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:)	
)	Case No.: 23-60507 (PGR)
The Roman Catholic Diocese of Ogdensburg,)	
New York)	Chapter 11
)	
Debtor.)	

**FIRST INTERIM APPLICATION OF BERKELEY RESEARCH GROUP, LLC
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 11, 2023 THROUGH NOVEMBER 30, 2023**

Berkeley Research Group, LLC (“BRG”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned Debtor (the “Debtor”), hereby submits this First Interim Fee Application (the “Application”) for the period from September 11, 2023 through November 30, 2023 (the “Fee Period”) in accordance with sections 105(a), 330 and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the Northern District of New York (the “Local Rules”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. §330, effective January 31, 1996 (the “U.S. Trustee Guidelines”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* dated November 9, 2023 [Docket No. 250] (the “Interim Compensation Order”). BRG hereby requests interim allowance of compensation in the amount of \$32,964.28 and no actual and necessary expenses for the Fee Period. In support of this Application, BRG respectfully represents as follows:

PRELIMINARY STATEMENT

1. During the Fee Period, BRG advised and assisted the Committee in fulfilling its statutory obligations and duties to Unsecured Creditors and rendered services to the Committee in accordance with its instructions and directions. By this Application, BRG requests that the Court authorize the interim allowance and payment of fees incurred by BRG during the Fee Period in the total amount of \$32,964.28 as compensation for services rendered to the Committee. During the Fee Period, BRG expended 69.6 hours at a blended hourly rate of \$473.62.

2. Attached hereto as **Exhibit C** is the schedule of BRG's time records for the Fee Period. These records include daily time logs describing the time spent by each BRG professional in this Chapter 11 Case organized by task code and by date incurred.

3. BRG also maintains records of all actual and necessary out-of-pocket expenses incurred in connection with the performance of its professional services. At this time BRG is not requesting reimbursement for any expenses incurred during the Fee Period but reserves the right to request reimbursement therefore in the future.

4. By this Fee Application, BRG seeks interim allowance and payment of all compensation for services rendered during the Fee Period.

JURISDICTION AND VENUE

5. This Court has jurisdiction to hear and determine this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(2).

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

7. Sections 328(a), 330, and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1 are the statutory predicates for the relief sought by this Fee Application.

BACKGROUND

8. On July 17, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Bankruptcy Court for the Northern District of New York (the “Chapter 11 Case”). The Debtor is operating its business and managing its properties as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this Chapter 11 Case.

9. On August 11, 2023, the Office of the United States Trustee (the “UST”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. *See Appointment of Committee of Unsecured Creditors [Docket No. 65]*.

10. Following the Committee’s appointment, the Committee determined it needed a financial advisor and, subject to Court approval, hired BRG on September 11, 2023. The Committee previously selected Pachulski Stang Ziehl & Jones LLP (“PSZJ” or “Committee Counsel”) to serve as its counsel.

11. On October 9, 2023, the Committee filed the *Application to Employ Berkeley Research Group, LLC as Financial Advisor Effective as of September 11, 2023* (the “Retention Application”).

12. On November 2, 2023, the Court entered the *Order Granting Application to Employ Berkeley Research Group, LLC as Financial Advisor for Official Committee of Unsecured Creditors*, effective as of September 11, 2023 (the “Retention Order”). The Retention Order provides that all compensation and reimbursement of costs and expenses incurred during BRG’s employment be paid only after appropriate application and approval of this Court.

PROFESSIONAL FEES AND DISBURSMENTS

13. By this Application, BRG seeks allowance of fees in the amount of \$32,964.28 for professional services rendered for and on behalf of the Committee during the Fee Period. At this time BRG is not requesting reimbursement for any expenses incurred during the Fee Period but reserves the right to request reimbursement in the future.

14. BRG charges for its services based on standard hourly rates established, subject to periodic adjustments to reflect economic and other conditions. For purposes of this engagement, BRG has agreed to a voluntary 17% rate concession from BRG's customary standard hourly rates in effect when services are rendered. BRG's standard hourly rates – before the agreed-upon rate concession – are competitive with other financial advisors that we consider our peers. BRG believes that the compensation in this Application is based on the customary compensation charged by comparably skilled professionals in cases other than cases under Title 11.

15. In addition, BRG bills for its actual, out-of-pocket expenses reasonably incurred in connection with this engagement including, but not limited to, travel expenses incurred in connection with the client's engagement that would not have been otherwise incurred, and industry or company-specific research as requested. BRG does not charge for telephone calls (except the cost of specifically identified conference call charges), faxes, copies, and other administrative expenses.

16. BRG maintains contemporaneous records of the time expended and actual, necessary expenses incurred in support of its billings. Time entries are recorded in six-minute increments.

STATEMENT REGARDING THE ESTATE'S ABILITY TO PAY CASE

17. To the best of BRG's knowledge, the estate is able to pay the requested fees and expenses. According to its most recent Monthly Operating Report, as of November 30, 2023 [Docket No. 326], the Debtor (a) reported approximately \$3.7 million in cash in its bank accounts (including over \$3.0 million in a bank account identified as "Restructuring") and (b) reported total assets of approximately \$21.1 million.

SUMMARY OF SERVICES RENDERED

18. BRG is a global strategic advisory and expert consulting firm that provides independent expert testimony, litigation and regulatory support, authoritative studies, strategic advice, advisory services relating to restructuring and turnaround situations, due diligence, valuation, and capital markets, and document and data analytics to major law firms, businesses, including Fortune 500 corporations, government agencies, and regulatory bodies around the world.

19. BRG has extensive experience in the areas of reorganization, workouts, insolvency, and accounting. The professionals engaged in this Chapter 11 Case have also worked in numerous other Catholic diocese bankruptcy cases throughout the country.

20. This Chapter 11 Case addresses issues that raise complex questions and require a high level of skill and expertise to address efficiently and accurately. The professional services described herein were performed by BRG to, among other things, analyze and evaluate the Debtor's financial position and guide the Committee through the Debtor's Chapter 11 case.

21. During the Fee Period, the Committee relied on the experience and expertise of BRG when dealing with the matters described herein. As a result, BRG devoted time and effort to properly and expeditiously perform the required professional services. BRG respectfully submits that the professional services that it rendered on behalf of the Committee were necessary and have

directly benefited the creditor constituents represented by the Committee and have contributed to the effective administration of this Chapter 11 Case.

22. BRG submits that the interim fees requested herein for professional services rendered in performing services for the Committee in this proceeding are fair and reasonable in view of the time spent, the extent of work performed, the nature of the Debtor's organization and financial condition, the Debtor's financial accounting resources, and the results obtained.

23. The work involved, and thus the time expended, was carefully assigned in light of the experience and expertise required for a particular task. The staff utilized sought to optimize efficiencies and avoid redundant efforts. BRG believes that there has been no duplication of services between BRG and any other consultants or accountants to the bankruptcy estate.

24. No agreement or understanding exists between BRG and any other person for the sharing of compensation received or to be received for services rendered in connection with the Chapter 11 Case, except for internal agreements among employees of BRG regarding the sharing of revenue or compensation. Neither BRG nor any of its employees have entered into an agreement or understanding to share compensation with any entity as described in Bankruptcy Code Section 504 and Bankruptcy Rule 2016.

25. The general summary of the services rendered by BRG during the Fee Period, based on tasks and the number of hours, before the agreed-upon rate concession, is set forth below.

200.90 – Document / Data Analysis (Production Requests)

26. During the Fee Period, BRG assisted the Committee and Committee Counsel with the analysis of documents and data initially produced by the Debtor – with a focus on assets and other financial matters. BRG initiated its analysis of over 2,200 individual documents which comprised thousands of pages of records relating to the Debtor (including the Diocese of

Ogdensburg Deposit & Loan Fund (“DLF”) and The Roman Catholic Diocese of Ogdensburg, New York Trust Fund (“DTF”), Parishes and other Non-Debtor Affiliates. BRG monitored and evaluated the various document productions received from the Debtor. As part of this process, BRG maintained a document tracker / production index which allowed BRG to actively monitor the ongoing document production process – including the identification of outstanding, incomplete, or missing requests – and to follow-up in a timely manner with the Debtor regarding questions or other related issues. Pursuant to its preliminary review of the Debtor’s initial document productions, BRG assisted Committee Counsel with the preparation of supplemental follow-up requests. When necessary, BRG participated in meetings with Committee Counsel and / or BRG team members to address issues relating to the ongoing document production process. BRG’s analysis of available documents and data and its identification of additional documents and data to be obtained from the Debtor and third parties will assist the Committee in its identification, investigation and analysis of critical case issues – including assets ultimately available for the benefit of Survivors and other creditors.

27. BRG expended 31.2 hours on this category for a fee of \$17,183.00.

220.00 – Debtors Operations / Monitoring
(Monthly Operating Reports / Periodic Reporting)

28. BRG evaluated the Debtor’s operations and financial activity as reported in Monthly Operating Reports (“MOR”) for July and August 2023. BRG’s evaluation of the Debtor’s MORs allows BRG to effectively monitor and evaluate the Debtor’s ongoing asset position and financial performance and report its findings to Committee Counsel and the Committee.

29. BRG expended 6.2 hours on this category for a fee of \$1,777.50.

300.00 – Asset Analysis (General – Debtors)

30. During the Fee Period, BRG initiated its analysis and investigation of the Debtor's assets. BRG focused its preliminary analysis on the Debtor's DLF and DTF. BRG assisted Committee Counsel in its evaluation of issues raised in the DLF / DTF Motion filed by the Debtor. BRG also analyzed assets disclosed by the Debtor in its Bankruptcy Schedules and Statement Of Financial Affairs. Finally, BRG met with Committee Counsel to evaluate its preliminary findings and coordinate additional analyses to be performed.

31. BRG expended 22.6 hours on this category for a fee of \$14,463.00.

1010.00 – Employment Application Preparation

32. BRG prepared its employment application, supporting declaration, and related disclosures for filing with the Court.

33. BRG expended 5.5 hours on this category for a fee of \$4,031.00.

1020.00 – Meeting Preparation & Attendance

34. As necessary, BRG attended meetings with Committee Counsel and Pension Committee Counsel to evaluate case issues, coordinate ongoing analyses and identify additional areas of investigation and focus.

35. BRG expended 2.9 hours on this category for a fee of \$2,081.50.

1060.00 – Fee Application Preparation & Hearing

36. BRG began its preparation of its first interim Fee Application for the period from September 2023 through November 2023.

37. BRG expended 1.2 hours on this category for a fee of \$180.00.

ALLOWANCE OF COMPENSATION

38. Section 330(a)(1)(A) of the Bankruptcy Code provides that the Court may award to a professional person, “reasonable compensation for actual, necessary services rendered.” 11 U.S.C. § 330(a)(1)(A). Section 330(a)(3)(A), in turn, provides that in determining the amount of reasonable compensation to be awarded, the Court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:

- i. The time spent on such services;
- ii. The rates charges for such services;
- iii. Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of, a case under this title;
- iv. Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- v. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

39. The congressional policy expressed above provides for adequate compensation in order to continue to attract qualified and competent professionals to bankruptcy cases. BRG respectfully submits that the consideration of these factors should result in this Court’s allowance of the full compensation sought.

CERTIFICATION

40. As required by the Local Rules, a certification that the facts set forth in this Application are true and correct, and that this Application complies substantially with the Local Guidelines, is attached hereto as **Exhibit A** and made part of this Application.

NOTICE

41. Pursuant to the Interim Compensation Order, BRG has provided notice of this Fee Application to the following parties by electronic or first-class mail: (a) the Debtor; (b) counsel for the Debtor; (c) counsel for the Committee; (d) counsel for any additional committees that may be hereafter appointed; and (e) the Office of the United States Trustee. In light of the nature of the relief requested herein, BRG submits that no other or further notice need be provided.

42. This is BRG's First Interim Fee Application pursuant to sections 330 and 331 of the Bankruptcy Code for allowance of fees and reimbursement of expenses in this Chapter 11 case. Except as otherwise set forth herein, BRG has made no prior or other application to this or any other Court for the relief requested herein.

CONCLUSION

43. BRG respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit B**, (a) granting on an interim basis, allowance of (i) fees in the amount of \$32,964.28 for professional services rendered to and on behalf of the Committee during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual, and necessary expenses incurred during the Fee Period, (b) authorizing and directing the Debtor to immediately pay to BRG the outstanding fees and expenses due to BRG for the Fee Period; and (c) granting such further relief as is just and proper.

Dated: February 5, 2024

BERKELEY RESEARCH GROUP, LLC

/s/ Matthew K. Babcock

Matthew K. Babcock

201 South Main, Suite 450

Salt Lake City, UT 84111

Telephone: 801-321-0068

Email: mbabcock@thinkbrg.com

*Financial Advisor for the Official Committee
of Unsecured Creditors*

Exhibit A

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:)	
)	Case No.: 23-60507 (PGR)
The Roman Catholic Diocese of Ogdensburg,)	
New York)	Chapter 11
)	
Debtor.)	
)	

CERTIFICATION OF FINANCIAL ADVISOR

I, Matthew K. Babcock, Director of Berkeley Research Group, LLC (“BRG”)¹, on behalf of BRG, as financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the Chapter 11 Case of the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby certify, pursuant to 28 U.S.C. § 1746, and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, effective January 30, 1996 (the “Guidelines”), as follows:

1. I am a Director of BRG and the professional designated by the applicant, BRG, with responsibility in this Chapter 11 Case, for compliance with the Local Rules and Guidelines.
2. This certification is made in respect of the *First Interim Application of Berkeley Research Group, LLC for Allowance of Compensation and Reimbursement of Expenses as Financial Advisor to the Official Committee of Unsecured Creditors from the Period from September 11, 2023 through November 30, 2023* (the “Application”) which I have reviewed and further which has been prepared in accordance with the Local Rules and Guidelines.
3. In respect of the Local Rules and Guidelines, I certify that:

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

- a) I have read the Application;
- b) To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Rules and Guidelines;
- c) The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by BRG and generally accepted by BRG's clients; and
- d) In providing a reimbursable service, BRG does not make a profit on that service, whether the service is performed by BRG in-house or through a third party.
- e) I certify pursuant to LR 2016-(1)(c)(2) that all expenses for which reimbursement is sought were incurred on behalf of the Committee and on other person and that the reimbursement, if allowed in full, will not exceed the amount applicant paid for the items.
- f) I have reviewed Local Rule 2016-1 and the Interim Compensation Order entered November 9, 2023 and believe that this Application substantially complies with such Rule and Order.

4. I certify, under penalty of perjury, that the foregoing statements made by me are true and correct, to the best of my knowledge, information, and belief.

Date: February 5, 2024
Salt Lake City, UT

/s/ Matthew K Babcock
Matthew K. Babcock

Exhibit B

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:)	
)	Case No.: 23-60507 (PGR)
The Roman Catholic Diocese of Ogdensburg, New York)	Chapter 11
)	
Debtor.)	

**ORDER GRANTING FIRST INTERIM APPLICATION OF
BERKELEY RESEARCH GROUP, LLC FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM SEPTEMBER 11, 2023 THROUGH NOVEMBER 30, 2023**

Berkeley Research Group, LLC (“BRG”), financial advisor to the Official Committee of Unsecured Creditors in the above-captioned case, filed its First Interim Application for Compensation for the Period from September 11, 2023 through November 30, 2023 (the “Fee Application”). In the Application, BRG requests (i) allowance on an interim basis compensation in the amount of \$32,964.28 for reasonable and necessary professional services and reimbursement of the actual and necessary costs and expenses in the amount of \$0.00 for the Fee Period of September 11, 2023 through November 30, 2023, and (ii) authorizing and directing the Debtor to pay the balance of such amounts to BRG.

The Court has reviewed the Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Fee Application, and having convened a hearing on March 5, 2024, were adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Fee Application. Accordingly, it is hereby

ORDERED that the Fee Application is GRANTED. The Debtor in the above captioned Chapter 11 Case shall pay to BRG interim fees in the total amount of \$32,964.28 for

services rendered and actual and necessary expenses incurred in the Chapter 11 Case during the Fee Period.

ORDERED the allowance of compensation and reimbursement of expenses pursuant to this Order is without prejudice to BRG's right to seek additional compensation for services performed and expenses incurred during the Fee Period, which were not processed at the time of the Application.

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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Exhibit C



Exhibit C: Time Detail

Berkeley Research Group, LLC

For the Period 9/11/2023 through 11/30/2023

Date	Professional	Hours	Description
200.90 Document / Data Analysis (Production Requests)			
9/20/2023	M. Babcock	1.1	Prepared supplemental document requests.
9/20/2023	R. Strong	0.5	Attended call with UCC Counsel (KD, JP) and BRG (MB) regarding document requests.
9/20/2023	M. Babcock	0.5	Met with UCC Counsel (JP, KD) and BRG (RS) to discuss document production issues.
9/27/2023	M. Babcock	0.3	Met with UCC Counsel (JP, KD) to discuss document requests / productions.
10/6/2023	M. Babcock	1.8	Updated supplemental document request.
10/10/2023	M. Babcock	0.3	Continued update of supplemental document request.
10/11/2023	M. Babcock	1.4	Updated supplemental document requests.
10/11/2023	R. Strong	0.6	Evaluated documents / data needed in conjunction with supplemental document request.
10/11/2023	P. Shields	0.4	Attended meeting with BRG (RS, MB) regarding supplemental document requests.
10/11/2023	R. Strong	0.4	Met with BRG (PS, MB) regarding document requests.
10/11/2023	M. Babcock	0.4	Met with BRG (RS, PS) to update supplemental document requests.
10/12/2023	M. Babcock	1.0	Continued update of supplemental document request.
10/13/2023	C. Tergevorkian	0.8	Prepared document request tracker / production index.
10/13/2023	M. Babcock	0.2	Followed-up with UCC Counsel on outstanding document request issues.
10/18/2023	M. Babcock	0.7	Met with UCC Counsel (JP, KD) to discuss supplemental document requests.
10/18/2023	M. Babcock	0.1	Evaluated issues related to supplemental document requests.
11/1/2023	S. Chaffos	1.4	Examined documents produced to date.

Date	Professional	Hours	Description
200.90 Document / Data Analysis (Production Requests)			
11/7/2023	C. Tergevorkian	1.3	Examined available document productions.
11/7/2023	C. Tergevorkian	1.3	Updated document request tracker.
11/9/2023	C. Tergevorkian	2.6	Prepared index of document productions relating to DTF / DLF.
11/14/2023	C. Tergevorkian	0.8	Evaluated documents / data needed in conjunction with DTF / DLF analysis.
11/20/2023	C. Tergevorkian	1.7	Updated document request tracker / production index (including Debtor responses to DLF / DTF requests).
11/21/2023	C. Tergevorkian	2.0	Updated document request tracker / production index (Vol002_ production).
11/21/2023	C. Tergevorkian	1.0	Updated document request tracker / production index (Vol001 production).
11/21/2023	C. Tergevorkian	0.5	Updated document request tracker / production index to include recent productions.
11/22/2023	C. Tergevorkian	2.9	Continued update of document request tracker / production index (Vol002_ production).
11/27/2023	C. Tergevorkian	0.7	Examined document production relating to DTF / DLF (November 22, 2023).
11/28/2023	C. Tergevorkian	1.7	Continued examination of document production relating to DTF / DLF (November 22, 2023).
11/28/2023	C. Tergevorkian	0.3	Updated production index for recent productions.
11/30/2023	M. Babcock	1.2	Examined recent document production (DLF / DTF).
11/30/2023	S. Chaffos	0.3	Met with BRG (MB, CT) and UCC Counsel (KD) to discuss document productions.
11/30/2023	C. Tergevorkian	0.3	Met with BRG (MB, SC) and UUC Counsel (KD) to discuss status of document production.
11/30/2023	M. Babcock	0.3	Met with UCC Counsel (KD) and BRG (CT, SC) to discuss document requests / productions (including DLF / DTF).
11/30/2023	M. Babcock	0.2	Met with BRG (CT) to discuss document requests / productions (including DLF / DTF).
11/30/2023	C. Tergevorkian	0.2	Spoke with BRG (MB) to discuss documents produced to date.
Task Code Total Hours		31.2	

Date

Professional

Hours

Description

220.00 Debtors Operations / Monitoring (Monthly Operating Reports / Periodic Reporting)

10/9/2023	C. Tergevorkian	0.9	Analyzed assets / operations reported in MOR (July 2023).
10/10/2023	S. Rawlings	1.1	Analyzed MOR cash receipts / disbursements (July 2023).
10/10/2023	C. Tergevorkian	0.8	Continued analysis of assets / operations reported in MOR (July 2023).
10/18/2023	S. Rawlings	0.2	Analyzed MOR balance sheet / income statements (July 2023).
10/20/2023	S. Rawlings	1.4	Continued analysis of MOR balance sheet / income statements (July 2023).
11/9/2023	S. Rawlings	1.0	Analyzed MOR ending bank statement balances (August 2023).
11/9/2023	S. Rawlings	0.5	Analyzed MOR cash receipts / disbursements (August 2023).
11/9/2023	S. Rawlings	0.3	Analyzed MOR balance sheet / income statements (August 2023).
Task Code Total Hours		6.2	

300.00 Asset Analysis (General - Debtors)

9/11/2023	M. Babcock	1.3	Analyzed assets identified in Debtor Schedules / Statements.
9/12/2023	M. Babcock	1.5	Analyzed DLF assets (including identification of additional documents / data to be requested from Debtor).
9/12/2023	M. Babcock	1.3	Analyzed DTF assets (including identification of additional documents / data to be requested from Debtor).
9/12/2023	R. Strong	0.7	Attended call with BRG (MB, PS) regarding document requests on DLF/DLT.
9/12/2023	M. Babcock	0.7	Met with BRG (PS, RS) to discuss DLF / DTF asset analysis.
9/12/2023	P. Shields	0.7	Met with BRG (RS, MB) to review document requests relating to DLF / DTF.
9/12/2023	M. Babcock	0.2	Met with UCC Counsel (JP) to discuss DLF / DTF asset analysis.
9/13/2023	M. Babcock	1.3	Updated DLF asset analysis (including identification of additional documents / data to be requested from Debtor).
9/13/2023	M. Babcock	0.8	Updated DTF asset analysis (including identification of additional documents / data to be requested from Debtor).
9/13/2023	M. Babcock	0.2	Reviewed document requests relating to DLF / DTF asset analysis.
9/14/2023	M. Babcock	1.0	Continued update of DTF asset analysis (including identification of additional documents / data to be requested from Debtor).

Date	Professional	Hours	Description
300.00 Asset Analysis (General - Debtors)			
9/14/2023	M. Babcock	0.7	Continued update of DLF asset analysis (including identification of additional documents / data to be requested from Debtor).
9/21/2023	M. Babcock	0.3	Prepared parish mapping analysis.
9/26/2023	S. Chaffos	0.5	Updated parish mapping analysis.
10/3/2023	C. Tergevorkian	0.3	Examined court filings relating to DLF / DTF.
10/12/2023	R. Strong	0.2	Met with BRG (MB, CT, SC [partial]) to coordinate ongoing asset analysis.
10/12/2023	M. Babcock	0.2	Met with BRG (RS, CT, SC [partial]) to coordinate ongoing asset analyses.
10/12/2023	C. Tergevorkian	0.2	Met with BRG (RS, MB, SC [partial]) regarding ongoing asset analyses.
10/12/2023	S. Chaffos	0.1	Attended call with BRG (RS, MB, CT [partial]) to discuss ongoing asset analyses [partial].
10/18/2023	S. Rawlings	1.9	Prepared comparative income statement analysis (2012 - 2022).
11/8/2023	C. Tergevorkian	1.3	Analyzed DTF / DLF assets (including available documents).
11/9/2023	C. Tergevorkian	0.8	Continued analysis of DTF / DLF assets (including available documents).
11/13/2023	M. Babcock	2.2	Examined assets disclosed in recent DLF document production.
11/13/2023	M. Babcock	2.0	Examined assets disclosed in recent DTF document production.
11/13/2023	P. Shields	0.3	Met with UCC Counsel (IS, JP) and BRG (MB) to evaluate historical activity of DLF / DTF.
11/13/2023	M. Babcock	0.3	Met with UCC Counsel (IS, JP) and BRG (PS) to discuss proposed budget for DLF / DTF activity.
11/14/2023	M. Babcock	0.9	Analyzed historical DLF / DTF transactions in conjunction with evaluation of Debtor budget.
11/22/2023	C. Tergevorkian	0.7	Analyzed DTF / DLF assets disclosed in available documentation.
Task Code Total Hours		22.6	
1010.00 Employment Application			
9/14/2023	M. Babcock	0.6	Prepared employment application (including related conflicts check).
9/15/2023	M. Babcock	0.5	Updated employment application.

1010.00 Employment Application

9/18/2023	M. Babcock	0.5	Continued update of employment application (including related conflicts check).
9/22/2023	M. Babcock	1.3	Prepared declaration (employment application).
9/25/2023	M. Babcock	0.5	Updated employment application (including related declaration).
9/25/2023	R. Strong	0.3	Attended call with BRG (PS, MB) regarding finalizing employment application.
9/25/2023	M. Babcock	0.3	Met with BRG (PS, RS) to discuss employment application.
9/25/2023	P. Shields	0.3	Met with BRG (RS, MB) regarding updates to employment application.
9/26/2023	M. Babcock	0.3	Continued update of employment application (including related declaration).
10/9/2023	M. Babcock	0.6	Finalized employment application.
10/30/2023	M. Babcock	0.3	Reviewed / executed Confidentiality Agreement.

Task Code Total Hours**5.5****1020.00 Meeting Preparation & Attendance**

9/14/2023	R. Strong	0.8	Met with UCC Counsel (IN [partial], KD, EG, KL, JP, IS) and BRG (MB, PS [partial]).
9/14/2023	M. Babcock	0.8	Met with UCC Counsel (IS, KD, JP, EG, KL, IN [partial]) and BRG (RS, PS [partial]) to discuss case issues.
9/14/2023	P. Shields	0.5	Participated in call with UCC Counsel (IS, KD, JP, EG, KL, IN [partial]) and BRG (RS, MB) regarding case status [partial].
11/1/2023	C. Tergevorkian	0.4	Met with BRG (MB) and UCC Counsel (KD, JP [partial], IS [partial]) to discuss case status.
11/1/2023	M. Babcock	0.4	Met with UCC Counsel (KD, JP [partial], IS [partial]) and BRG (CT) to discuss case issues.

Task Code Total Hours**2.9****1060.00 Fee Application Preparation & Hearing**

10/9/2023	D. Godfrey	0.6	Prepared interim fee application (September 2023 - November 2023).
11/9/2023	D. Godfrey	0.3	Updated interim fee application (September 2023 - November 2023).
11/14/2023	D. Godfrey	0.3	Continued update of interim fee application (September 2023 - November 2023).

Date

Professional

Hours

Description

1060.00 Fee Application Preparation & Hearing	
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Task Code Total Hours

1.2

Total Hours

69.6